



U.S. Department of Justice

United States Attorney
Southern District of New York86 Chambers Street, 3rd Floor
New York, New York 10007USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/18/2021

November 17, 2021

BY ECF

Hon. Victor Marrero, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write jointly on behalf of all parties respectfully to request a further adjournment of the deadline for Plaintiffs to file an application, if they choose to do so, for fees under the Equal Access to Justice Act. The deadline is currently November 19, 2021. (ECF No. 132). The parties seek an adjournment until January 7, 2022, to allow them additional time to discuss the issue of fees and whether litigation will be required. In particular, the defendants continue to analyze and assess Plaintiffs' demand, and have also continued to be delayed by other docket responsibilities of the undersigned counsel, including an imminent trial scheduled to take place before the end of the year.

The parties thank the Court for its consideration of this joint request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendants

: /s/ Rebecca S. Tinio
REBECCA S. TINIO
CHARLES S. JACOB
Assistant United States Attorneys
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2774/2725
E-mail: rebecca.tinio@usdoj.gov
charles.jacob@usdoj.gov

Request GRANTED.

Plaintiffs shall have until January 7, 2022 to file an application for fees under the Equal Access to Justice Act.

SO ORDERED.

11/18/2021

DATE

VICTOR MARRERO, U.S.D.J.